

EPA Region 5 Records Ctr.



364793

**EXTENT OF CONTAMINATION SAMPLE PLAN
FOR
MICHCON STATION H SITE
DETROIT, WAYNE COUNTY, MICHIGAN
TDD: 805-9803-018
PAN: 8M1601RAXX**

June 12, 1998

Prepared for:

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Ecology and Environment, Inc.**

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1.0 INTRODUCTION

The United States Environmental Protection Agency (U.S. EPA) requires that all environmental monitoring and measurement efforts mandated or supported by U.S. EPA, participate in a centrally managed quality assurance (QA) program. Any party generating data under this program has the responsibility to implement minimum procedures to assure that the precision, accuracy, completeness, and representativeness of its data are known and documented. To ensure the responsibility is met uniformly, each party must prepare a written Field Sampling Plan (FSP) covering each project it is to perform.

This FSP presents the organization, objectives, functional activities and specific Quality Assurance (QA) and Quality Control (QC) activities associated with the removal projects conducted by the Emergency Response Branch in Region 5. This FSP also describes the specific protocols which will be followed for sampling, sample handling and storage, chain of custody, and laboratory analysis.

All QA/QC procedures will be in accordance with applicable professional technical standards, U.S. EPA requirements, government regulations and guidelines, and specific project goals and guidelines. This FSP is prepared by Ecology & Environment, Inc., Superfund Technical Assessment and Response Team (START) under TDD #S05-9803-016.

2.0 SITE DESCRIPTION AND HISTORY

2.1 Site Location

The MichCon Station H (MCH) site is located at 201 South Green Avenue in Detroit, Michigan (Figure 1). The site is located at geographical coordinates latitude 42°18'1" N and longitude 83°6'19" W. This site is the location of a former carburetted water gasification plant known as the Detroit City Gas Plant (DCGP). DCGP is currently known as Michigan Consolidated Gas Company (MichCon).

The site is situated in an urban/industrial area and is bounded to the northwest by Chesapeake and Ohio Railroad tracks, to the northeast by Post Street, to the southeast by a commercial business, and to the southwest by South Green Avenue and a commercial produce distributor. The nearest residential areas are located approximately 0.25 miles south and southeast of the site. Southwestern High School is located at the southeastern corner of Post and Fort Streets; approximately 500 feet northeast of the site.

The DCGP operations ceased in 1945, and the majority of the property was sold to the American Charcoal Company (ACC). ACC operated the site between 1946 and 1976. In 1976, the site was sold to the A & A Scrap Iron Metal Company (A & A). A & A utilized the site as a scrap metal storage and processing facility until 1995, when the site reverted to the State of Michigan due to nonpayment of property taxes. According to City of Detroit Environmental Affairs personnel, the City of Detroit obtained the property from the State of Michigan for Brownfields redevelopment in November 1997.

Although the main portion of the site was sold by MichCon in 1946, MichCon currently owns a small parcel on the site. The southeastern portion of the site was the former location of a railroad spur, and the present owner of this area is not known.

2.2 Preliminary Assessment/Site Inspection Results

EDI Engineering and Science (EDI), retained by MichCon, conducted an initial site investigation in August 1984. The scope of the investigation included assessing the air, surface and subsurface soils, and groundwater at the site. Analytical results indicated that the surface soils contained elevated total lead concentrations as high as 1,500 milligrams per kilogram (mg/kg). Analytical results from groundwater samples indicated additional contamination with several inorganic contaminants and polynuclear aromatic hydrocarbons.

The City of Detroit scheduled the buildings at the site for upcoming demolition. The Michigan Department of Environmental Quality (MDEQ) conducted a limited removal of surface drums inside the buildings and scattered throughout the site areas. On November 10, 1997, MDEQ removed 37 drums containing various materials, including oils, resins, paint sludges, petroleum distillates, and phosphoric acid.

On February 3, 1998, the Ecology & Environment, Inc. (E & E), Superfund Technical Assessment and Response Team (START) met with Ed Novak of MDEQ and conducted a site reconnaissance. START observed that the site consisted of two brick buildings, a concrete pad and building foundation, and

three piles of soil and debris. The three piles contained soil, construction debris, and waste with many drums visible in each pile. The site was not adequately fenced on the northeastern side allowing unrestricted access to the site.



A second site visit on February 4, 1998, with U.S. EPA On-Scene Coordinator (OSC) Ralph Dollhopf revealed two rusted capacitors at the site with stained soil underlying one of the capacitors. START returned to the site on February 6, 1998, to collect samples from the capacitors and underlying soil. Analytical results obtained from samples collected from residual oil and soil beneath one of the capacitors indicated 100,000 mg/kg polychlorinated biphenyls (PCBs).

2.3 Removal Activities Performed and Current Site Situation

On June 8, 1998, U.S. EPA, START, and the Emergency Cleanup Services (ERCS) mobilized to the site to conduct removal activities. The proposed activities included: develop and implement a site health and safety plan and emergency contingency plan; implement appropriate site security measures; identify, inventory, and characterize hazardous wastes in drums and small containers found on site; transport and dispose of hazardous materials/hazardous waste, including electrical capacitors, in compliance with U.S. EPA's Off-Site Rule (40 CFR Section 300.440, 58 Federal Register 49215 September 22, 1993; conduct an extent-of-contamination (EOC) study of surface soils; evaluate removal and disposal options for contaminated surface soil; and dispose of highly contaminated soil identified in the EOC in accordance with appropriate cleanup standards.

The site safety plan has been prepared and approved. Site security has also been put into place. ERCS has completed clearing of the soil piles and the drums have been staged. Soil has been excavated under the former locations of the two capacitors identified during the site assessment and under an additional capacitor identified during removal activities. The drums have been sampled for waste characterization and disposal acceptance and analytical results are pending.



 <p>Michigan</p> <p>Detroit</p>	 <p>ecology and environment, inc. Superfund Technical Assessment and Response Team Region 5</p>		
<p>SOURCE/DATE</p> <p>USGS 7.5 Minute Series</p> <p>Dated and Derived Quadrangles 1980 and 1988</p>	<p>TITLE</p> <p>Site Location Map</p>	<p>FIGURE</p> <p>1</p>	
	<p>SITE</p> <p>MichCon "H"</p>	<p>SCALE</p> <p>1:17,280</p>	
	<p>CITY</p> <p>Detroit</p>	<p>STATE</p> <p>Michigan</p>	
		<p>TDD</p> <p>805-980 3-016</p>	

3.0 PROJECT OBJECTIVES

3.1 Specific Objectives

The objectives for the proposed sampling activities are derived from the potential for PCB contamination at the site in the soils surrounding the immediate location of the capacitors. The entire site will be characterized for PCB contamination due to the uncertainty surrounding how and when the capacitors were brought to the site.

The main focus of the extent of contamination study will be on the surface soils at the site. A thorough analysis of the surface soils at the site would provide the location and concentration of any additional contamination at the site.

3.2 Scope of Project

The primary sample analysis for surface soils is to be based upon the recent finding of PCB-contaminated soil identified at the site. Generic Residential/Commercial /Industrial Cleanup Criteria for soil was established provided in the MDEQ document entitled Integrated Tables of Part 201 Cleanup Criteria & Screening Levels, 1994. The total values, based on human health effects due to direct contact for a commercial property, is 9.3 parts per million (ppm). The Toxic Substance Control Act (TSCA) specifies in Title 40 Code of Federal Regulations Section Part 761, Subpart G that for PCB spills in nonrestricted access areas, the cleanup level will be 10 ppm by weight. Any soils that are found to exceed either the MDEQ or TSCA action levels will be assessed for removal during the time-critical removal activities.

3.3 Data Quality Assurance/Quality Control

To assure the validity of the sample procedure and laboratory analysis, the collected samples could be analyzed under the QA2 rationale as set forth in OSWER Directive 9360.4-01, April 1990. A collocated sample will be collected to determine the variability of the matrix and contaminants at the site within a small area.

4.0 SAMPLING PROCEDURES AND LOCATIONS

4.1 Sampling Protocol

The extent of contamination will be determined by sampling surface soil at the MCH site. The surface soil sampling will be done to determine the potential health and safety concerns based on threats to future workers and nearby residential populations. The Standard Operating Procedure for Soil Sampling (Appendix A); Guidance Document - Verification of Soil Remediation (Appendix B); and the Title 40 Code of Federal Regulations, Part 761, Subpart G (Appendix C) will be followed to the maximum extent practical to complete the extent of contamination study. The surface soil samples will be collected using a teflon or stainless steel hand trowels or spoons. Sampling will proceed from the least impacted area to the most impacted area if discernable. All sampling stations will be staked or marked in the field, photographed, and documented in a field logbook (Figures 2).

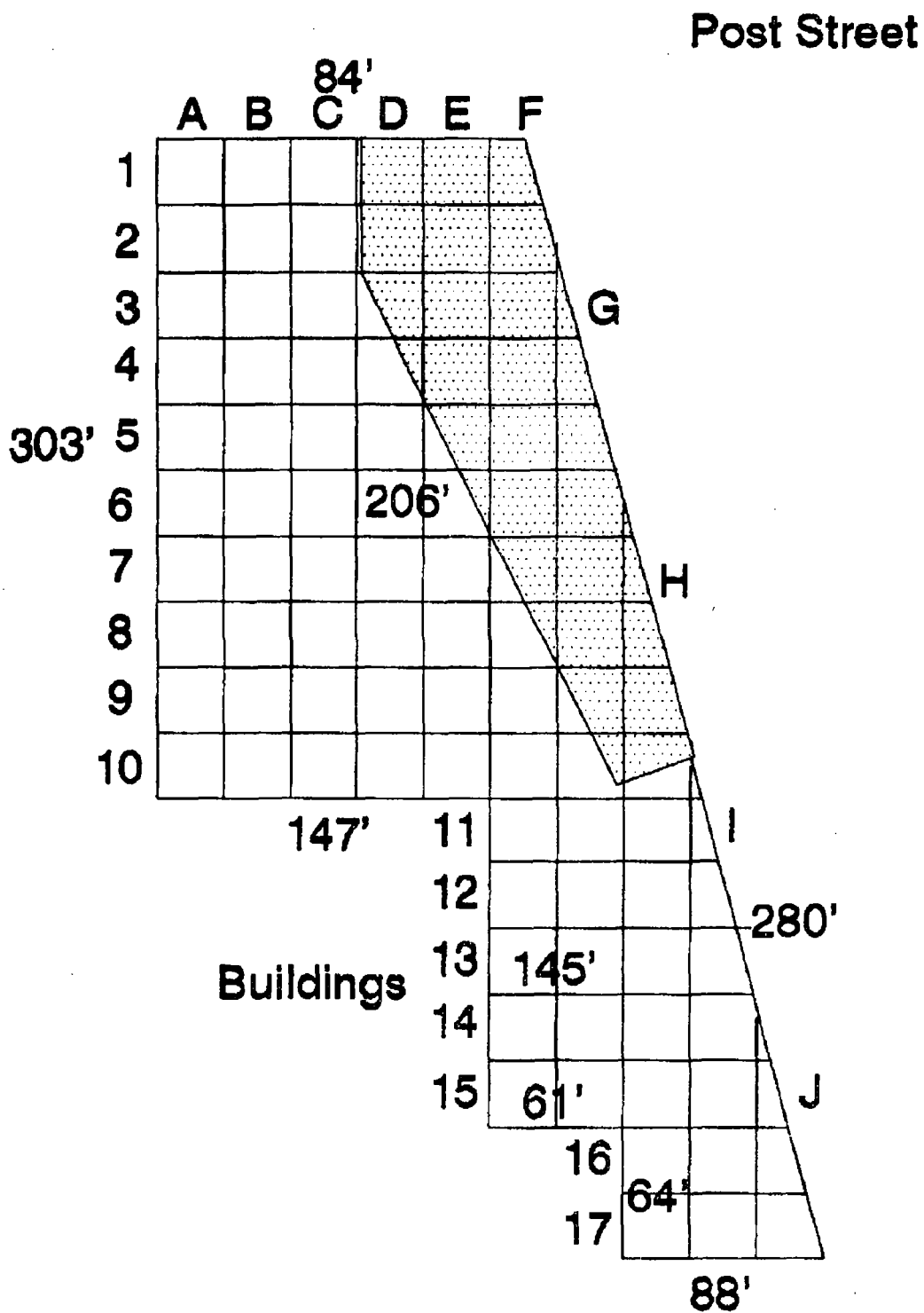
4.2 Sampling Locations

The surface soil sampling grid origin is located in the western corner of the MCH site at Post Street. The grid blocks are 30 feet by 30 feet square and are laid out with a numbering system that runs parallel to the South Green Avenue and Post Street. A total of 68 grids will be laid out and 25 percent of those grid squares will be sampled. The grids chosen to be sampled will be bias in areas of suspected contamination (near known areas of contamination, under former soil piles) and the remaining will be random. The samples will consist of 20 aliquots per grid to form a composite sample of the surface soil within the grid. The proposed locations of surface samples are shown on Figure 2.

A section of the site from grid square D1 to H10 will be sampled after the completion of soil excavation to a reasonable depth which would remove potentially PCB-contaminated soil. At the completion of the excavation, samples will be collected from this area following the guidelines outlined in this plan.

4.3 Analytical Services

All soil samples being analyzed for PCBs will be sent to an EPA approved environmental laboratory for analyses. The ERCS contractor will bid and acquire a laboratory for the analyses of all concrete, water, and soil samples. The samples will be packed on ice and delivered to the laboratory no later than two days after sample collection. A completed and signed Chain of Custody will accompany the samples throughout any shipment or transfers.

**Figure 2**

Ecology & Environment, Inc., June 12, 1998

5.0 SUMMARY

The goal of the sampling event is to assess the need for further action. Further action could include excavation of impacted soil or recommendations to another party for further action. Upon receipt of the analytical results, the U.S. EPA will consult the previously mentioned documents to determine the appropriate steps to be taken.

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION REPORT

I. HEADING

DATE: June 11, 1998

SUBJECT: Pollution Report for MichCon Station H site, Detroit,
Wayne County, MI

FROM: Jim Augustyn, OSC, Region V, ERB, RS1, Westlake, OH

TO: K. Mould, USEPA, OSWER, Washington, DC.....(VIA LAN)
R. Karl, Chief, ERB, Chicago, IL.....(VIA LAN)
J. El-Zein, Chief RS1, Grosse Ile, MI.....(VIA LAN)
W. Messenger, Chief ESS, Chicago, IL.....(VIA LAN)
C. Graszer-Ropski, ESS, Chicago, IL.....(VIA LAN)
M. Anastasio, ORC, Chicago, IL.....(VIA LAN)
V. Narsete, ERS, Chicago, IL.....(VIA LAN)
L. Fabinski, ATSDR, Chicago, IL.....(VIA LAN)
A. Howard, MDEQ ERD, Lansing, MI.....(E-mail)
M. Vanderlaan, MDEQ, Livonia, MI.....(E-mail)
E. Novak, MDEQ, Detroit, MI.....(E-mail)
M. Chezick, DOI, Philadelphia, PA.....(E-mail)
Duty Officer, NRC, Washington, DC.....(E-Mail)
S. Lyle, Environmental Department, Detroit, MI....(FAX)

POLREP 1 - CERCLA Fund Lead Removal

Start Date: June 8, 1998

II. BACKGROUND

Site No.:	B552
Delivery Order Number:	5001-05-714
Response Authority:	CERCLA
CERCLIS ID Number:	MID981190002
NPL Status:	Not on NPL
MDEQ Notification:	MDEQ notified
Latitude/Longitude:	42~18'10"North/83~06'19"West
Start Date:	June 8, 1998
Completion Date:	NA

III. SITE INFORMATION

A. Incident Category

CERCLA incident category: Inactive Scrap Yard

B. Site Description

1. Site Location

The MichCon Station H (MCH) site is located at 201 South Green Avenue, Detroit, Wayne County, Michigan (42°18'10"N, 83°06'19"W). The site is bordered to the northwest by Chesapeake and Ohio Railroad tracks, to the northeast by Post Street, to the southeast by a commercial business, and to the southwest by South Green Avenue and a commercial produce distributor. Approximately 16,500 people live within a 1-mile radius of the site. Southwestern High School is located approximately 500 feet northeast of the site at the corner of Post and Fort Streets.

The MCH site consists of three separate properties which are located in an urban/industrial area of Detroit. The site was owned and operated by the Detroit City Gas Company (DCGC) between 1913 and 1945, and served as a carburetted water gasification plant. DCGC is currently known as Michigan Consolidated Gas Company (MichCon). Operations at the site ceased in 1945, and the one large property was sold to the American Charcoal Company (ACC). ACC operated at the site between 1946 and 1976. In 1976, the site was sold to the A and A Scrap Iron Metal Company (A & A). A & A utilized the site as a scrap metal storage and processing facility until 1995, when the site reverted to the State of Michigan due to nonpayment of taxes. The City of Detroit obtained the property from the State of Michigan for Brownfields redevelopment in November 1997. MichCon currently owns a small parcel located along the northwest portion of the site due to an underlying natural gas line and the former location of a natural gas regulator station. The owner of the remaining parcel, located on the southeast portion of the site, is presently unknown.

2. Description of Threat

Analytical results from samples collected during the U.S. EPA site assessment on February 6, 1998, indicated a substantial threat to public health and the environment posed by the presence of soil contaminated with high levels of polychlorinated biphenyls (PCBs) from leaking electrical capacitors. Leaking drums containing suspected hazardous substances are also present at the surface and in waste piles at the site. In addition, numerous high-pressure gas cylinders are located throughout the site.

C. Preliminary Assessment/Site Inspection Results

On February 3, 1998 a site reconnaissance was conducted. The site consists of two brick buildings, a concrete pad and building foundation, and three waste piles of soil and debris. The three piles contained soil, debris, and other wastes. Many drums were also discovered in each pile. No fencing was present on the northeastern edge of the site to restrict access. In addition to the waste piles, the site was littered with various wastes, including piles of tires and roofing materials, pieces of concrete and brick, automobile fuel tanks, and empty fuel oil tanks.

On February 4, 1998, during an additional site reconnaissance, two decaying electrical capacitors were discovered on site. The capacitors appeared to be old and possibly contained PCBs. The soil surrounding one of the capacitors appeared to be stained with oil.

IV. RESPONSE INFORMATION

A. Situation

1. Current situation

U.S. EPA, START, and ERCS contractors mobed to the site on June 8, 1998. Work areas have been cleared of debris and brush, and trailers have been mobed to site. A total of three capacitors have been discovered on site. Soil in the areas of the discovered capacitors have been sampled and sent for analysis. ERCS crew has begun stockpiling tires and debris. Metal debris has been sent out for recycling. Security has been established during hours of inactivity.

2. Removal activities to date: June 8-11, 1998

On June 8, 1998, ERCS crew began removing debris, brush, and soil from the southeast section of the site. Office and decon trailers were mobed to site.

On June 9, 1998, ERCS crew continued with the clearing and stockpiling of debris and tires on site. Waste piles were excavated to determine the volume of wastes on site. A third capacitor was found in the Y-shaped pile in the northeast section of the site.

On June 10 and 11, 1998, debris and tire stockpiling continued. A staging area was set for drums on site. The area where the third electrical capacitor was marked out with a grid and sampled to determine if PCBs are present in the soil.

3. Enforcement

Subsequent to the time critical removal action, a comprehensive subsurface extent of contamination study will be performed. Negotiations with potentially responsible parties are ongoing.

B. Planned Removal Activities

1. Develop and implement a site health and safety plan and emergency contingency plan;
2. Implement appropriate site security measures;
3. Identify, inventory, and characterize hazardous wastes in drums and small containers found on site;
4. Transport and dispose of hazardous materials/ hazardous waste, including electrical capacitors, in compliance with U.S. EPA's Off-Site Rule (40 CFR Section 300.440, 58 Federal Register 49215 September 22, 1993);
5. Conduct an extent-of-contamination (EOC) study of surface soils. Evaluate removal and disposal options of contaminated surface soil; and
6. Dispose of highly contaminated soil identified in the EOC in accordance with appropriate cleanup standards (if necessary).

C. Next Steps

1. Complete site investigation for additional drums and capacitors by clearing brush and debris.
2. Collect samples from drums and soil for waste characterization.
3. Procure disposal for waste based on analytical results.

D. Key Issues

None.

V. COST INFORMATION

Costs through 6/8/98

	<u>Budget</u>	<u>Used to date</u>	<u>Remaining</u>
ERCS Contractor	\$264,500	\$22,259.05	\$242,240.95
START	\$ 14,000	\$ 6,905.16	\$ 7,094.84
U.S. EPA	\$ 29,400	\$ 1,140.01	\$ 28,259.99
Total	\$307,900	\$ 30,304.22	\$277,595.78

VI. DISPOSITION OF WASTES

On June 10th and 11th, 1998, two 30-cubic yard roll-off boxes containing nonhazardous scrap metal were removed from the site.

On June 11, 1998, 17 high-pressure gas cylinders were disposed of from the site.

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION REPORT

I. HEADING

Date: July 15, 1998

Subject: Pollution Report for MichCon Station H site, Detroit,
Wayne County, MI

From: Ralph Dollhopf, OSC, Region V, ERB, Grosse Ile, MI
Jim Augustyn, OSC, Region V, ERB, Westlake, OH

To:

K. Mould, USEPA, OSWER, Washington, DC.	(VIA LAN)
R. Karl, Chief, EERB, Chicago, IL	(VIA LAN)
J. El-Zein, Chief RS1, Grosse Ile, MI	(VIA LAN)
W. Messenger, Chief ESS, Chicago, IL	(VIA LAN)
C. Graszer-Ropski, ESS, Chicago, IL	(VIA LAN)
M. Anastasio, ORC, Chicago, IL	(VIA LAN)
V. Narsete, ERS, Chicago, IL	(VIA LAN)
A. Howard, MDEQ ERD, Lansing, MI	(E-mail)
M. Vanderlaan, MDEQ, Livonia, MI	(E-mail)
E. Novak, MDEQ, Detroit, MI	(E-mail)
Duty Officer, NRC, Washington, DC	(E-Mail)
S. Lyle, Environmental Department, Detroit, MI	(FAX)

POLREP No.: POLREP 5-CERCLA Fund Lead Removal and Final

Start Date: June 8, 1998

II. BACKGROUND

Site No.:	B552
Delivery Order Number:	5001-05-714
Response Authority:	CERCLA
CERCLIS Number:	MID981190002
NPL Status:	Not on NPL
MDEQ Notification:	MDEQ notified
Latitude/Longitude:	42~18'10"North/83~06'19"West
Start Date:	June 8, 1998
Completion Date:	July 15, 1998

III. SITE INFORMATION

A. Incident Category

CERCLA incident category: Former Manufactured Gas Plant Site and
Former Scrap Metal Yard

B. Site Description

(See Polrep 1 for details on site location and history)

The MichCon H site is located in Detroit, Wayne County, Michigan,
at 201 South Green Street. The site consisted of numerous tires,

various non-hazardous debris, 1 storage tank of No 2 fuel oil (approximately 200 gallons), and 5 PCB-contaminated electrical capacitors and PCB-contaminated material and soil. Removal activities conducted by U.S. EPA included the removal of the No 2 fuel oil, the excavation and removal of 5 PCB-contaminated electrical capacitors, the stockpiling of tires and other non-hazardous debris on site, and the construction of a perimeter fence through a sub-contractor. The City of Detroit and it's selected contractors participated in removal activities on site by removing the tires and non-hazardous debris, the removal of all asbestos-contaminated material, and demolition of three on site buildings.

IV. RESPONSE INFORMATION

A. Situation

1. Current situation

U.S. EPA, START, and ERCS contractors mobed to the site on June 8, 1998. All known PCB-contaminated soils above the removal action level have been removed. Post excavation closure sample analysis confirm that PCB concentrations are below the action level.

Fencing sub-contractor has completed the installation of all perimeter fencing. Warning signs have been posted along the site perimeter at 100 foot intervals. The City of Detroit has completed building demolition on site.

2. Response activities to date: July 1-13, 1998

(See Polrep 4 for removal activities prior to July 1, 1998)

On July 1, 1998, Demolition of buildings on site by the City of Detroit began.

On July 2, 1998, Building demolition continued and removal of demolition debris began.

On July 6, 1998, Building demolition and debris removal continued.

On July 7, 1998, Building demolition and debris removal continued.

On July 8, 1998, Building demolition and debris removal continued.

On July 9, 1998, Building demolition and debris removal are completed. The fence sub-contractor has returned to site to complete the last section of the perimeter fence where the buildings once stood. Fence sub-contractor completed fence.

On July 13, 1998, Signs reading DANGEROUS-HAZARDOUS SUBSTANCES PRESENT KEEP OUT are posted on the perimeter fence.

3. Enforcement

Following the time critical removal action, a comprehensive subsurface extent of contamination study will be performed. Negotiations with potentially responsible parties are ongoing.

B. Planned Removal Activities

Planned removal activities included the segregation of non-hazardous debris, and the removal of all surface hazardous waste and PCB-contaminated material.

C. Next Steps

Complete negotiations with potentially responsible parties. MichCon representatives have indicated to U.S. EPA that MichCon intends to enter into an Administrative Order of Consent (AOC) with U.S. EPA for the remaining EE/CA investigation and non time critical removal work.

D. Key Issues

The MichCon H Superfund Site, located on the southwest side of Detroit, Michigan, was the site of extensive PCB soil contamination. This removal has been conducted by the U.S. EPA region 5, Emergency Response Branch. The removal has been completed and costs have reached \$350,000. All surface PCB-contamination above the action level has been removed from site. Access to the site has been restricted by a perimeter fence.

V. COST INFORMATION

Costs through 7/13/98

	<u>Budget</u>	<u>Used to date</u>	<u>Remaining</u>
ERCS Contractor	\$345,000	\$329,501	\$15,499
START	\$25,000	\$16,247	\$8,753
U.S. EPA	\$29,400	\$9,346	\$20,054
Total	\$399,400	\$355,094	\$44,306

The above accounting of expenditures is an estimate based on figures known by the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data, which then OSC must rely on, may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

VI. DISPOSITION OF WASTES

On June 10th and 11th, 1998, three 30-cubic yard roll-off boxes containing nonhazardous scrap metal were removed from site for recycling by R & F Metals Company Inc. of Detroit, MI.

On June 11, 1998, 17 high-pressure gas cylinders were disposed of from site by Michigan Air Gas.

On June 16, 1998, five loads, approximately 36 cubic yards each, of tires were removed from site by the City of Detroit and taken to the Detroit Recycling Center.

On June 17, 1998, four drums of fuel oil No 2 were taken to Michigan Recovery Services Inc. of Romulus, MI and one drum containing 5 PCB-contaminated electrical capacitors was taken to USPCI. Also 830 tons of PCB-contaminated soil were transported to Wayne Disposal Inc. of Belleville, MI.

On June 18, 1998, 887 tons of PCB-contaminated soil were transported to Wayne Disposal Inc.

On June 19, 1998, 542 tons of PCB-contaminated soil were transported to Wayne Disposal Inc.

On June 24, 1998, 42 tons of PCB-contaminated soil were transported to Wayne Disposal Inc.

As of June 24, 1998 2,301 tons of PCB-contaminated soil have been removed from site.